

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MOHAMMAD ISLAM, Individually and on Behalf
of All Others Similarly Situated,

Plaintiffs,

v.

LYFT, INC.,

Defendant.

Case No. 1:20-cv-03004

District Judge Ronnie Abrams

**DECLARATION OF IAN
MUIR IN SUPPORT OF
LYFT, INC.'S MOTION TO
COMPEL ARBITRATION**

I, Ian Muir, declare as follows:

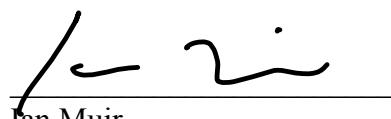
1. I have been employed by Lyft, Inc. ("Lyft") since June 2018 as a Head of Department of Economics.
2. The following facts are based on my personal knowledge and review of Lyft records. If called upon to testify as a witness, I could and would testify competently to the truth.
3. In the ordinary course of business, Lyft maintains information about rides given on its platform, including information about when and where users begin and end such rides. In my capacity as Head of Department of Economics, I have access to this ride information, and I am familiar with this information and the manner in which it is recorded and maintained.

4. I have reviewed Lyft's business records, including the ride information discussed in paragraph 3, to determine how many rides on Lyft's platform involving the crossing of state lines.

5. According to Lyft's business records, between approximately 1.97% and 1.98% of completed rides on Lyft Platform in the United States involved crossing state lines during the time period from November 21, 2016 to February 15, 2020. To determine the percentage of interstate rides, I reviewed the passenger pickup and drop-off locations of each ride on the Lyft platform during this timeframe. After determining the total number of rides that crossed state lines while transporting a passenger, I divided that number by the total number of rides during the same timeframe. The analysis considered all rides given nationwide.

6. According to Lyft's business records, approximately 2.05% of completed rides on Lyft Platform in the United States involved crossing state lines during the time period from February 15, 2019 to February 15, 2020. To determine the percentage of interstate rides, I reviewed the passenger pickup and drop-off locations of each ride on the Lyft platform during this timeframe. After determining the total number of rides that crossed state lines while transporting a passenger, I divided that number by the total number of rides during the same timeframe. The analysis considered all rides given nationwide.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of July, 2020 in San Francisco, California.



Ian Muir